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21 *Attorneys for Plaintiff*

22 **IN THE UNITED STATES DISTRICT COURT**
23 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
24 **SAN FRANCISCO DIVISION**

25 LUIS BRAVO, individually and on behalf of all
26 others similarly situated,

27 *Plaintiff,*

28 *v.*

1 SAMSUNG ELECTRONICS AMERICA, INC.,
2 a New York corporation,

3 *Defendant.*

4 Case No. 3:15-cv-00885-WHA

5 **NOTICE OF VOLUNTARY DISMISSAL**

6 Action Filed: February 26, 2015

7 Judge: Honorable William H. Alsup

PLEASE TAKE NOTICE that Plaintiff Luis Bravo (“Bravo”), by and through his undersigned counsel and pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), hereby voluntarily dismisses this action *without prejudice* as to his individual claims against Defendant Samsung Electronics America, Inc. (“Samsung”) and *without prejudice* as to the claims of the putative class he sought to represent. In support of the instant notice, Bravo states as follows:

1. Bravo filed his Class Action Complaint against Samsung on February 26, 2015.
(Dkt. 1.)

2. Federal Rule of Civil Procedure 41(a)(1)(A)(i) provides, in relevant part, that a “plaintiff may dismiss an action without court order by filing a notice of dismissal before the opposing party serves either an answer or a motion for summary judgment.”

3. Samsung has not served an answer or motion for summary judgment in this action.

4. Accordingly, this action may be dismissed *without prejudice* as to Bravo's individual claims against Samsung and *without prejudice* as to the claims of the putative class Bravo sought to represent, without an Order of the Court.

5. Pursuant to Civil L.R. 3-3(c), if this action is “refiled, [Bravo will] file a Motion to Consider Whether Cases Should be Related...[and transferred] to the Judge originally assigned to the action....”

Respectfully submitted,

LUIS BRAVO, individually and on behalf of all others similarly situated,

Dated: June 10, 2015

By: /s/ Benjamin H. Richman
One of Plaintiff's Attorneys

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